

THOMAS E. FRANKOVICH (State Bar No. 074414)

THOMAS E. FRANKOVICH,

A Professional Law Corporation

1832- A Capitol Street

Vallejo, CA 94590

Telephone: (415) 444-5800

Facsimile: (415) 674-9900

Attorney for Plaintiff

IRMA RAMIREZ

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IRMA RAMIREZ,

Plaintiff,

v.

APENA CORP, a California Corporation
dba PLAZA TEQUILA TAQUERIA;
DEMETRIOS GIANNIS, Trustee and
ROSE GIANNIS, Trustee of the Giannis
Family Trust,

Defendants..

CASE NO. 15-cv-03808-EMC

**STIPULATION RE CONTINUING
DEADLINE FOR THE PARTIES TO
CONDUCT THE JOINT SITE
INSPECTION, [PROPOSED] ORDER
THEREON**

Plaintiff and Defendants by and through their respective attorney of record, respectfully request and stipulate, as follows:

1. **Whereas**, defendants have been served with the summons and complaint and have answered plaintiff's complaint;

2. **Whereas**, pursuant to General Order 56, ¶3,4, the parties are to have the Joint Site Inspection at the Plaza Tequila Taqueria, located at/near 19315 Highway 12, Sonoma, California, no later than December 3, 2015 . However, due to scheduling conflicts and the holidays, the parties are unable to conduct the General Order 56 Joint Site Inspection by the December 3rd deadline.

3. **Therefore**, in light of the above, the parties have agreed to reschedule and conduct the joint site inspection on December 10, 2015.

STIPULATION RE CONTINUING DEADLINE FOR THE PARTIES TO CONDUCT THE JOINT SITE
INSPECTION and [PROPOSED] ORDER THEREON

IT IS SO STIPULATED.

This stipulation may be executed in counterparts and have the same force and effect as though all signatures are on the same and/or consecutive pages. Photocopies and facsimile shall have the same force and effect as originals.

Respectfully submitted,

Dated: November 24, 2015

THOMAS E. FRANKOVICH, Esq.
A PROFESSIONAL LAW CORPORATION

By: /s/ Thomas E. Frankovich
Thomas E. Frankovich
Attorney for Plaintiff IRMA RAMIREZ

Dated: November 24, 2015

ATTORNEY AT LAW

By: /s/ Marvin Pederson
Marvin Pederson
Attorney for Defendant Apena Corp.

Dated: November 24, 2015

DICKENSON, PEATMAN & FOGARTY, P.C.

By: /s/Joy Durand
Joy Durand
Attorney for Defendants Demetrios Giannis and
Rose Giannis

PROPOSED ORDER

IT IS SO ORDERED, that the last day for the parties and counsel to conduct the joint site inspection of the premises be continued up to and including December 10, 2015.

Dated: November 25, 2015

Honorable Edward M. Chen
United States District Court for the District of Columbia

IT IS SO ORDERED

Judge Edward M. Chen

STIPULATION RE CONTINUING DEADLINE FOR THE INSPECTION and PROPOSED ORD